



November 27, 2020

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VIA ECF ONLY

The Honorable Edward S. Kiel, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

JOINT LETTER REGARDING JURISDICTIONAL DISCOVERY

**Re: Praetorian Insurance Company a/s/o Raymond Samoroo v.
Air Vent Inc., et al.
Civil Case No.: 2:18-cv-12314-SDW-ESK
Our File No. 10905.00090**

Dear Judge Kiel:

This firm is counsel to Third-Party Defendant Powermax Electrical Co., Ltd. (“Powermax”) in the above-captioned matter.

Pursuant to Your Honor’s Text Order of November 18, 2020, counsel for Powermax and Defendant/Third-Party Plaintiff Air Vent Inc. (“Air Vent”) have virtually “met” and conferred regarding the jurisdictional discovery issues that Powermax presented to this Court through correspondence dated November 13, 2020 (Document 102).

Counsel agree to an extension of time for Powermax to respond to the Requests for Admission. The responses will now be due on December 7, 2020.

Since November 13, 2020, the issuance of visas to cross the China-Hong Kong border (for a deposition) have decreased and travel has been further dissuaded and restricted by authorities based upon the resurgence of CoVid-19. Counsel for Powermax and Air Vent agree that we may need the benefit of the court’s insight to determine when a deposition of a Powermax representative will be feasible.

Counsel continue to work collaboratively to address the questions regarding the scope of the document requests. To address potential limitations, counsel agreed to utilize basic information regarding Powermax’s relationships with the twenty-seven entities identified in the subparts to the

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document requests. Counsel for Powermax is working to gather the information and a second “meet and confer” has been scheduled in the hope that counsel will reach an agreement. Even if counsel manage to agree on all remaining issues at that time, counsel agree that additional time will be needed to complete jurisdictional discovery.

Therefore, counsel jointly request a continuance of the conference scheduled for December 4, 2020. Counsel are available at any time on December 8, 2020. This extension is not intended to delay the matter, but rather to permit the parties additional time to obtain information that may lead to resolution of the remaining issues regarding the scope of discovery.

We thank Your Honor for your time and attention in this regard.

Very truly yours,

WILSON ELSE MOSKOWITZ EDELMAN & DICKER, LLP


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Via Email only

cc: All counsel of record via ECF.